



**Docket No. 01-0662
Mark Cottrell Phase 2 Rebuttal Affidavit
Schedule MJC-3**

MPSC Case No. U-12320

Draft Compliance Plan

For

Special Service and UNE Repair Coding Accuracy

February 13, 2003

Repair Coding Accuracy Compliance Plan

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1. Purpose

The purpose of this draft compliance plan is to describe the actions Michigan Bell Telephone Company's ("SBC's") proposes to take to improve the accuracy and completeness¹ of closeout codes upon repair completion for Special Services and Unbundled Network Elements (UNEs). SBC originally proposed a trouble report closeout code improvement plan on October 30, 2002 ("October 30 Compliance Filing"). As directed by the Michigan Public Service Commission's (MPSC's) Order issued on January 13, 2003 ("January 13 Order"), in Case No. U-12320, this draft has been revised to be a compliance plan. It also addresses the operational concerns identified in BearingPoint's Report, and those discussed in the technical workshop and submitted in written comments. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain BearingPoint to evaluate SBC's implementation of the final compliance plan.

2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems (OSS) testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special Service and UNE circuits. The initial exception report for Michigan had included benchmark failures for Resale, UNE and Special Service circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in August 2002 and reported that while Resale circuits had passed their test requirements, UNE and Specials had not. This exception encompassed all five Midwest states. BearingPoint's October 30, 2002 OSS Test Report found that test criteria for TVV7-12 and TVV7-14 were "not satisfied." In its final retest for Michigan, BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Special Service closeouts were coded correctly. The UNE coding has successfully closed in the other four SBC Midwest states and Special Service coding remains in retest in Illinois. Wisconsin has successfully completed Special Service coding retesting.

In response to BearingPoint's evaluation, SBC has identified problem areas and implemented a number of corrective measures, which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented². In its final retest in Michigan,

¹ AT&T stated, "accuracy is equally important as completeness." See, 11/15/02 Connolly Affidavit, p. 36, para 83

² The retest in Michigan was completed prior to the implementation of these initiatives.

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BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Specials were coded correctly.

3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office. When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

- 1) Situations in which the fault inserted by BearingPoint was subsequently reported as “No Trouble Found” (NTF) by SBC.
- 2) Situations in which the fault inserted by BearingPoint on the network side of the circuit was subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
- 3) Situations the same as Item #2 above, but no CLEC billing was applied.
- 4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

A few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. However, most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits³ and repaired them as well. The technician corrected the multiple faults but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as “NTF”.

For items that fell within Situation #2 and #3, the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Although such performance is unacceptable, it did not have a significant impact on either CLEC billing or repair performance reporting. Indeed, of the 25 reported errors in coding (out of 136 total retests), only 3 would have resulted in either inappropriate billing or erroneous exclusion of data from performance results. This represents an overall billing/performance error rate of only 2.2 percent.

Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician. These types of closeout errors had no impact on the overall billing/performance error rate because they incorrectly coded where in the SBC network the fault was corrected.

³ Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

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Accordingly, with the exception of Situation # 1 the root cause for incorrect close out codes was repair technician error, either in the field, the central office or by the LOC Maintenance Administrators (MAs).

4. Actions

The internal improvement plan proposed by SBC in its October 30, 2002 filing was constructed to address the accuracy of trouble ticket closure coding for special service and UNE repairs. The plan included many of the steps identified in the proposed compliance plan.

The MPSC in its January 13 Order directed that the repair coding accuracy improvement issue be addressed via a compliance plan so that an independent third party can verify the results achieved. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. In its comments, AT&T stated that the MPSC should require SBC to address this coding issue and stated that incorrect coding could lead to incorrect performance measurement results reporting. Further, AT&T was concerned that under SBC's proposed Improvement Plan, the original source information would not be available for review.⁴ AT&T also questioned the relationship between SBC's proposed monthly quality reviews and improved accuracy and completeness of closeout coding. SBC has addressed the requirements of the MPSC and the comments of AT&T in the following enhanced plan.

The following activities identify the steps that SBC has taken or plans to take to improve the accuracy and completeness of trouble ticket closure coding for special service and UNE repairs.

Documentation Updates include:

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special Service and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.
- Local Operations Center (LOC) Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators (MAs) to take that will improve coding accuracy when a mechanized loop test (MLT) indicates "Open Out"⁵

⁴ See AT&T's comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83.

⁵ "Open out" condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

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following a circuit retest. All MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.

- SBC updated the internal Methods and Procedures (M&P) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and to clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
 - Installation and Repair (I&R) internal Job Aids (JA 170 - August 20 & JA 43 - August 30, 2002) were updated to reflect the M&P changes/clarifications.
 - Awareness sessions were conducted 8/23/02 thru 11/05/02 to review updated procedures.
 - A LOC “Flash” (02RC49) was issued 8/26/02 to reflect the new disposition codes.
 - The Customer Service Bureau (CSB) Handbook was updated 8/26/02 to reflect the new disposition codes.
 - A CSB “Flash” was issued to notify CSB personnel of updated handbook procedures.
- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for trouble ticket coding in central offices (COs). The new coding process has also been incorporated into the “Frame Management Plan”, which is an ongoing quality control measure utilized by the Central Office management.

Training Review Sessions Include:

- SBC conducted training review sessions (aka awareness sessions) to reinforce current procedures used for the close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all Installation and Repair (I&R) Operations Center personnel were completed by August 13, 2002. A “Cable Multiple” ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (CTTN). SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not “detached” and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was

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completed for I & R Operations Center employees through Awareness Sessions conducted between August 8 and August 15, 2002.

- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
 - Sessions covering all Installation and Repair (I&R) field technicians were completed by August 12, 2002.
 - Additional training sessions with I&R personnel were conducted in November 2002.
- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.
- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.
- Review sessions were conducted through January 31, 2003 with all SBC Midwest Central Office technicians to review the newly created Methods and Procedures for trouble ticket coding.
- On February 10, 2003 the LOC began to conduct workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.
- On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.

Management Review Activities

- On October 30, 2002, LOC management initiated monthly reviews of coding accuracy on all employee trouble tickets closures.
- In December 2002, LOC management initiated bi-monthly random reviews of trouble ticket closures. The results of these reviews will be tracked and reported via an internal intranet tracking mechanism.
- On February 10, 2003, LOC management initiated a “Ticket Closure Approval Team” for Resale/UNE-P trouble tickets. Each LOC MA will be required to receive approval prior to closing a trouble ticket until a 95% accuracy rate is achieved
- To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

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- I&R management will use the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special Service and UNE circuit trouble reports.

SBC acknowledges that the “original source information” as noted by AT&T⁶ is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party Compliance evaluation.

The following provides the timelines and current status of each of the items contained in the actions noted above:

⁶ See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83

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Task	Begin	End	Status
1. Update documentation for Cause Code 600	6/01//02	06/30/02	Completed
2. Update LOC Job Aid JA-27B	07/31/02	08/01/02	Completed
A. Conduct Job Aid Training	08/01/02	08/09/02	Completed
3. Develop "awareness" training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for "Cable Multiple" trouble tickets	08/01/02	08/08/02	Completed
A. Conduct "Awareness" sessions	08/08/02	08/15/02	Completed
4. Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line	8/10/02	08/11/02	Completed
A. Conduct awareness sessions	08/11/02	08/12/02	Completed
5. Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.			
A. I&R internal job aids were updated to reflect M&P changes/clarification	08/20/02	08/30/02	Completed
B. Conduct I&R awareness sessions to review updated job aids	08/23/02	11/5/02	Completed
C. Issue LOC "Flash" to advise of new disposition codes	08/26/02	08/26/02	Completed
E. Issue CSB "Flash" to advise of handbook updates with new disposition codes	08/26/02	08/26/02	Completed
6. LOC management initiates "Ticket Closure Approval Team"	02/10/03		Ongoing
7. LOC will initiate ongoing workshops to review proper coding procedures	2/10/03		Ongoing
8. Conduct LOC monthly reviews on all employee trouble ticket closures	10/30/02		Ongoing
9. LOC management will conduct bi-monthly random reviews of trouble ticket closures	12/01/02		Ongoing
10. Update Central Office M&P for trouble ticket closure	12/16/02	12/16/02	Completed
A. Conduct review sessions with Central Office technicians	12/17/02	01/31/03	Completed
B. Incorporate trouble ticket coding reviews into the "Frame Management Plan"	01/01/03		Ongoing
11. Conduct review training sessions with Special Service Center personnel	11/20/02	11/25/02	Completed

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Task	Begin	End	Status
12. Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	12/01/02		Ongoing
13. Incorporate quality reviews of trouble tickets into current I&R quality control measures	12/01/02		Ongoing

5. Third Party Examination Approach

Since training and awareness sessions have been completed, after an appropriate period of internal monitoring and review as set by SBC, the accuracy and completeness of closure codes for special services and UNE repairs is expected to improve when compared to BearingPoint's test results of 82.1% for special services and 84.8% for UNE. SBC's target is 95% accuracy for UNE trouble ticket coding and 90 % for Special Service Circuit trouble ticket coding. If the third party evaluation does not show the target has been achieved, any further required actions will be determined by the MPSC and SBC. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

- The third party will review coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with MPSC staff prior to its implementation
- The third party will affirm SBC's implementation of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's self-audit results.